

**COHENMILSTEIN**

Michael Eisenkraft  
Partner  
meisenkraft@cohenmilstein.com

February 20, 2025

**VIA ECF**

The Honorable Zahid N. Quraishi  
United States District Court  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Lewandowski v. Johnson & Johnson et al.*, No. 3:24-cv-00671-ZNQ-RLS (D.N.J.)

Dear Judge Quraishi,

Pursuant to the Court's recent Order (ECF 71), Plaintiff intends to file a Second Amended Complaint addressing the issues in the Court's Opinion (ECF 70). Plaintiff respectfully requests a 14-day extension of the existing deadline to file the Second Amended Complaint, from February 24, 2025 until March 10, 2025, due to personal and professional commitments her counsel have this week which will continue through the existing deadline. In turn, Defendants have requested an extension until April 22, 2025 to file a response to or motion to dismiss the Second Amended Complaint. Plaintiff has met and conferred with Defendants, and Defendants have indicated that they consent to the requested extensions.

If Plaintiff's request for a 14-day extension until March 10, 2025 to file their Second Amended Complaint, and the Defendants' corresponding request to extend the deadline to respond to or file a motion to dismiss the Second Amended Complaint to April 22, 2025, meets with Your Honor's approval, we respectfully request that the Court endorse this letter on the "SO ORDERED" line below and enter it on the docket. We thank Your Honor for your consideration of this matter.

Respectfully,

/s/ Michael Eisenkraft  
Michael Eisenkraft

cc: Defendants' counsel of record (via ECF)

**SO ORDERED**  
s/ Zahid N. Quraishi  
**ZAHID N. QURAISHI**  
**UNITED STATES DISTRICT JUDGE**  
DATED: 02/21/2025